SCOTT N. SCHOOLS (SCBN 9990) 1 Interim United States Attorney 2 MARK KROTOSKI (CASBN 138549) Chief, Criminal Division 3 DEREK R. OWENS (CASBN 230237) 4 Special Assistant United States Attorney 5 450 Golden Gate Avenue, Box 36055 San Francisco, California 94102 6 Telephone: (415) 436-6488 7 Fax: (415) 436-7234 derek.owens@usdoj.gov 8 Attorneys for Applicant 9 10 UNITED STATES DISTRICT COURT 11 NORTHERN DISTRICT OF CALIFORNIA 12 SAN FRANCISCO DIVISION 13 No. 3 07-70028 JL 14 IN THE MATTER OF A UNITED STATES' MOTION TO CRIMINAL COMPLAINT UNSEAL CRIMINAL COMPLAINT 15 AND RELATED DOCUMENTS AND (PROPOSED) ORDER 16 17 The United States hereby moves the Court for an order unsealing the above captioned 18 Criminal Complaint and Affidavit, and the Sealing Motion and Order originally accompanying 19 those documents, until further order of the Court. This Court's Order of Release Conditions, 20 specifically the requirement forbidding the defendant to contact, or attempt to contact, the victim 21 and/or witnesses in this case, have addressed the United States' concerns for victim/witness 22 safety. 23 24 DATED: March 1, 2007 Respectfully Submitted, 25 SCOTT NASCHOOLS United Sta 26 27 28 Special Assistant United States Attorney

ORDER

Based upon the motion of the United States, and for good cause shown, IT IS HEREBY ORDERED that the above captioned United States' Criminal Complaint and attached Affidavit, along with the Sealing Motion and Order originally accompanying those documents, shall be unsealed until further order of the Court.

DATED:

HON. MARIA-ELENA JAMES United States Magistrate Judge